

Exhibit A

Exhibit 1: Redacted

July 08, 2021

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY,)	Case No. 18-Civ. 12355
individually and as)	
personal representative)	
of the Estate of Keren)	VIRTUAL VIDEOTAPED
Shatsky, J ANNE)	DEPOSITION OF DR. RIYAD
SHATSKY, individually)	MANSOUR
and as personal)	
representative of the)	
Estate of Keren)	
Shatsky, TZIPPORA)	
SHATSKY SCHWARZ, YOSEPH)	
SHATSKY, SARA SHATSKY)	
TZIMMERMAN, MIRIAM)	
SHATSKY, DAVID RAPHAEL)	
SHATSKY, GINETTE LANDO)	
THALER, individually)	
and as personal		
representative of the		
Estate of Rachel		
Thaler, LEOR THALER,		
ZVI THALER, ISAAC		
THALER, HILLEL		
TRATTNER, RONIT		
TRATTNER, ARON S.		
TRATTNER, SHELLEY		
TRATTNER, EFRAT		
TRATTNER, HADASSA		
DINER, Yael HILLMAN,		
STEVEN BRAUN, CHANA		
FRIEDMAN, ILAN		
FRIEDMAN, MIRIAM		
FRIEDMAN, YEHIEL		
FRIEDMAN, ZVI FRIEDMAN,		
and BELLA FRIEDMAN,		

Plaintiffs,

against

July 08, 2021

1 THE PALESTINE
LIBERATION ORGANIZATION
2 and THE PALESTINIAN
AUTHORITY (a/k/a "The
3 Palestinian Interim
Self-Government
4 Authority" and/or "The
Palestinian National
5 Authority"),

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Defendants.

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July 08, 2021

1 VIRTUAL VIDEOTAPED DEPOSITION OF DR.

2 RIYAD MANSOUR, a witness herein, called by the
3 Plaintiffs, for examination, taken pursuant to
4 the Federal Rules of Civil Procedure, by and
5 before Karen A. Nickel, a Certified Realtime
6 Reporter and a notary public in and for the
7 Commonwealth of Pennsylvania, held remotely
8 with all parties appearing from their
9 respective locations, on Thursday, July 8,
10 2021, at 9:30 a.m.

11 COUNSEL PRESENT:

12 For the Plaintiffs:

13 Ronald F. Wick, Esq. (Admitted Pro Hac Vice)
14 Cohen & Gresser, LLP
2001 Pennsylvania Avenue, NW
Suite 300
15 Washington, DC 20006

16 Stephen M. Sinaiko, Esq.
Cohen & Gresser, LLP
17 800 Third Avenue
New York, NY 10022

18 For the Defendants:

19 Mitchell R. Berger, Esq.
Joseph Alonzo, Esq.
20 Salim Kaddoura, Esq.
Squire Patton Boggs
21 2550 M Street NW
Washington, DC 20037

22 Also Present: Cosette Vincent
23 Eszter Vincze

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- - -
I N D E X

WITNESS PAGE

Dr. Mansour

By Mr. Wick 6

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P R O C E E D I N G S

THE VIDEOGRAPHER: Good

morning, everyone. We are now on the record. Participants should be aware that this proceeding is being recorded and, as such, all conversations held will be recorded unless there is a request and agreement to go off the record.

This is the remote video-recorded deposition of Riyadh Mansour. Today is Thursday, July 8, 2021. The time is now 13:32 UTC time.

We are here in the matter of Shatsky versus PLO. My name is Corey Wainaina, remote video technician on behalf of US Legal Support located at 90 Broad Street, New York, New York.

I am not related to any party in this action, nor am I financially interested in the outcome. At this time, will the reporter, Karen Nickel, on behalf of US Legal Support, please enter the statement for remote proceedings into the record?

THE REPORTER: The attorneys participating in this deposition acknowledge that I am not physically present in the

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1 deposition room and that I will be reporting
2 this deposition remotely.

3 They further acknowledge that, in
4 lieu of an oath administered in person, the
5 witness will verbally declare his testimony in
6 this matter is under penalty of perjury.

7 The parties and their counsel
8 consent to this arrangement and waive any
9 objections to this manner of reporting. Please
10 indicate your agreement by stating your name
11 and your agreement on the record.

12 MR. WICK: This is Ron Wick,
13 Cohen and Gresser, for the Plaintiffs, and the
14 Plaintiffs agree.

15 MR. BERGER: This is Mitchell
16 Berger for the Defendants, we agree.

17 DR. RIYAD MANSOUR, a witness herein,
18 having been first duly sworn, was examined and
19 testified as follows:

20 EXAMINATION

21 BY MR. WICK:

22 Q. Good morning, Dr. Mansour.

23 A. Hi.

24 Q. I thank you for coming today.

25 A. Welcome.

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1 Q. My name is Ron Wick. I represent
2 Plaintiffs in this lawsuit. And let me just
3 ask you off the bat, have you had your
4 deposition taken before?

5 A. Yes.

6 Q. Okay. So you are somewhat familiar
7 with the process but let's just -- I'm going to
8 ask you some questions, of course, but before I
9 do that, I want to go over the process with you
10 so that we are all on the same page. Is that
11 all right?

12 A. Okay.

13 Q. The court reporter will be
14 transcribing everything we say today, so to
15 make sure that the record is accurate, and
16 especially since this deposition is taking
17 place by a video conference, it is important
18 that we not speak over each other, so that only
19 one person speaks at a time.

20 I would ask that you please wait
21 until I finish my questions before you start to
22 answer them, and I will do my very best to wait
23 until you finish your answer before I ask
24 another question.

25 Fair enough?

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1 A. I will do my best. Thank you.

2 Q. Okay. It is also important that you
3 respond to my questions verbally. For example,
4 if you shake or nod your head, the court
5 reporter cannot transcribe that answer.

6 A. I understand.

7 Q. If you don't understand a question,
8 please let me know, I will try to rephrase it
9 for you. If you do answer a question, I will
10 assume that you understood. Okay?

11 A. Okay.

12 Q. Your counsel, Mr. Berger,
13 undoubtedly will object to some of my
14 questions. Unless your counsel instructs you
15 not to answer the question, you should go ahead
16 and answer my question even though there was an
17 objection. Is that understood?

18 A. Yes.

19 Q. We will be taking periodic breaks
20 through the deposition. If at any point you
21 need a break, please let me or Mr. Berger know.
22 I will do my best to accommodate your request.

23 The only thing I ask of you is that,
24 if a question is pending, I would ask you
25 answer that question first before we take a

July 08, 2021

1 break. All right?

2 A. I understand.

3 Q. Are you taking any medication today
4 that would prevent you from answering my
5 questions fully and accurately?

6 A. No.

7 Q. Is there any other reason that you
8 can think of as to why you would not be able to
9 answer my questions today fully and accurately?

10 A. No.

11 Q. Just a few terms I want to go over
12 that I will be using during the course of the
13 deposition and I want to make sure that we are
14 all on the same page.

15 I will be referring, from time to
16 time, to the PA, and by that I mean the
17 Palestinian Authority; is that okay?

18 A. Okay.

19 Q. And I will use the term PLO to refer
20 to the Palestine Liberation Organization;
21 understood?

22 A. Yes.

23 Q. And I may use the shorthand term
24 Observer Mission, by which I mean the Permanent
25 Observer Mission of the State of Palestine to

July 08, 2021

1 the United Nations; is that all right?

2 A. It is okay.

3 Q. Okay. If we could go to the first
4 tab. I'm going to show you a document,
5 Mr. Mansour.

6 A. Okay.

7 THE VIDEOGRAPHER: Counsel,
8 would you like to see the document and the
9 witness for the video record?

10 MR. WICK: Yes, please.

11 THE VIDEOGRAPHER: Okay.

12 BY MR. WICK:

13 Q. Dr. Mansour, I'm showing you a copy
14 of a Notice that the Plaintiffs in this action,
15 my clients, sent to your counsel regarding your
16 deposition today. Have you seen a copy of this
17 Notice?

18 A. No.

19 Q. I'm sorry?

20 A. No.

21 Q. You have not seen a copy?

22 A. Except now in front of me.

23 Q. Okay. How did you learn that you
24 were being asked to testify at a deposition
25 today?

1 A. By my lawyer.

2 Q. I don't want you to tell me anything
3 that you talked about in that regard with your
4 lawyer. Is it your understanding that you are
5 testifying today pursuant to this Notice of
6 Deposition?

7 A. Yes.

8 Q. Did you do anything to prepare for
9 your deposition?

10 A. Yes.

11 Q. What did you do?

12 A. Met with my lawyer.

13 Q. And was anybody else present when
14 you met with your lawyer?

15 A. No.

16 Q. Did you meet with anybody other than
17 your lawyer to prepare for your deposition?

18 A. No.

19 Q. And did you review any documents in
20 preparing for your deposition?

21 A. I believe that I have seen
22 documents, I understood from my lawyer, that
23 have been provided to you, basically, about my
24 schedule.

25 Q. So you reviewed the calendar

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1 documents that were provided to us?

2 A. Yes.

3 Q. Do you -- to the best of your
4 recollection, did you review any other
5 documents in preparation for your deposition
6 today?

7 A. No.

8 Q. And when you said you met with your
9 lawyer to prepare for your deposition, are you
10 referring to Mr. Berger?

11 A. Yes.

12 Q. Did you meet with any other lawyers?

13 A. Early in the process, yes, but the
14 -- for this deposition is with Mitch.

15 Q. By "early in the process," do you
16 mean at the beginning of the lawsuit?

17 A. No. When we were approached to make
18 deposition.

19 Q. And, approximately, how long ago was
20 that?

21 A. A month, month and a half ago.

22 Q. And at that time, who did you meet
23 with?

24 A. I think Mitch can -- I don't
25 remember the names, Mitch can remember them.

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1 One, Baloul, I think, I believe, his last name.

2 The other one I don't remember.

3 Q. Mr. Baloul?

4 A. Yes.

5 Q. And there was another attorney as
6 well?

7 A. Yes.

8 Q. Was it Mr. Alonzo?

9 A. I don't remember the name.

10 Q. Fair enough. And when you reviewed
11 your calendar entries that were provided to us
12 in preparing for your deposition, did those
13 documents refresh your memory at all as to any
14 events?

15 A. Yes.

16 Q. Specifically, did they refresh your
17 memory as to the events in question on the
18 calendar?

19 A. Calendar is very basic as to
20 hundreds of meetings. So it refreshed my
21 memory as to which meeting, with whom, so that
22 I remember, you know, these sort of -- to
23 refresh my memory about these things, yes.

24 Q. And did you bring any documents with
25 you to the deposition today?

1 A. No. Other than the two documents
2 that I have here.

3 Q. What are the two documents that you
4 have there?

5 A. These two documents. This one, this
6 one.

7 Q. Okay. It appears to me that you are
8 showing me the copy of your calendar entries
9 and a copy of the Defendants' revised privilege
10 log?

11 A. Yes.

12 Q. Is that correct?

13 A. Yes.

14 Q. Okay. I would like to just step
15 back for just a moment and do a quick
16 housekeeping measure. I understand that
17 Ms. Nickel is in Pennsylvania. Dr. Mansour,
18 where are you today?

19 A. In my office in New York, 115 East
20 65th Street, New York, New York.

21 Q. So you are in the Observer Mission
22 building?

23 A. Yes.

24 MR. WICK: I just want to be
25 clear that we are all in agreement, per Rule 29

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1 of the Federal Rules of Civil Procedure, that
2 Ms. Nickel is an appropriate officer before
3 whom today's deposition can be taken.

4 Are we in agreement on that,
5 Mr. Berger?

6 MR. BERGER: Yes. So
7 stipulated.

8 MR. WICK: Thank you.
9 BY MR. WICK:

10 Q. Dr. Mansour, you indicated earlier
11 that you had had your deposition taken before.
12 On how many occasions have you had your
13 deposition taken previously?

14 A. I remember one about 20 some years
15 ago.

16 Q. And do you recall what that case was
17 about?

18 A. Yes. It was a case of Palestinian-
19 American businessman, and the case, I believe
20 he -- a case of undocumented alien --

21 THE COURT REPORTER: I'm
22 having a little bit of trouble hearing the
23 witness. He's cutting out a little bit and I
24 did not hear the end.

25 THE WITNESS: Can you hear me

July 08, 2021

1 now?

2 THE COURT REPORTER: Yes.

3 THE WITNESS: I said that,
4 yes, I appeared in a case about 20 years ago in
5 Orlando, Florida, a case of a Palestinian-
6 American businessman accused of employing
7 undocumented aliens in his business.

8 BY MR. WICK:

9 Q. Were you a party to that case, a
10 Plaintiff or Defendant?

11 A. I was not a party, but I was
12 organizing the legal counsel for that
13 Defendant.

14 Q. I'm sorry, I didn't understand your
15 answer. Could you please repeat that?

16 A. I said I was organizing a legal
17 counsel in the defense of the Defendant.

18 Q. You were organizing legal counsel in
19 the defense?

20 A. Yes.

21 Q. Why was that?

22 A. Because he was a friend and part
23 owner of the company that I worked for.

24 Q. And which company was that?

25 MR. BERGER: This is focused

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1 on jurisdictional predicates, and I don't see
2 what his prior deposition testimony has to do
3 with anything.

4 MR. WICK: I think this is
5 basic background questioning, Mitch. I don't
6 plan to spend a lot of time on it.

7 MR. BERGER: You can answer.

8 THE WITNESS: It is Interim
9 Investment Commercial Company in Orlando,
10 Florida.

11 BY MR. WICK:

12 Q. Interim investment company?

13 A. Yes.

14 Q. Okay. And have you previously
15 testified in court?

16 A. Yes, I testified during the
17 course -- the prosecutor wanted me to testify,
18 and I did.

19 Q. And that was in the same case where
20 you gave your deposition?

21 A. It wasn't a deposition. I don't
22 know if there is a difference between
23 deposition and testifying, but I did that in
24 that case.

25 Q. Okay. Were you in a courtroom?

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1 A. Yes.

2 Q. Okay. Other than that occasion
3 where you testified in the case involving
4 interim investment --

5 A. I don't recall.

6 Q. Have you ever -- do you recall ever
7 testifying under oath?

8 A. I don't recall.

9 Q. Fair enough. Dr. Mansour, are you a
10 U.S. citizen?

11 A. Yes.

12 Q. Are you a naturalized U.S. citizen?

13 A. Yes.

14 Q. And where do you currently live?

15 A. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 A. [REDACTED]

20 Q. [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 A. [REDACTED]

24 [REDACTED]

25 Q. Understood. [REDACTED]

July 08, 2021

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[REDACTED]

[REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

[REDACTED]

Q. [REDACTED]

[REDACTED]

A. [REDACTED].

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

[REDACTED]

[REDACTED]

Q. Does she work for the Observer
Mission?

A. Yes.

Q. I'm going to spell the name. Is it
first name A-L-M-A-Z, last name
J-O-U-D-E-E-T-A?

A. If you have it in a document, I

July 08, 2021

1 think you are correct.

2 (Deposition Exhibit Nos. 1 and
3 2 were marked for identification.)

4 BY MR. WICK:

5 Q. Dr. Mansour, I'm showing you Exhibit
6 2, which is a list provided by your counsel of
7 what we understand to be personnel of the
8 Observer Mission since January 4, 2020. And I
9 would ask you to look at that document and [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 A. [REDACTED]

14 Q. [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 A. [REDACTED]

23 Q. [REDACTED]

24 [REDACTED]

25 [REDACTED]

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[REDACTED]

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A.

[REDACTED]

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Q.

[REDACTED]

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[REDACTED]

5

A.

[REDACTED]

6

Q.

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

A.

[REDACTED]

10

Q.

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

A.

[REDACTED]

14

[REDACTED]

15

Q.

[REDACTED]

16

A.

[REDACTED]

17

Q.

[REDACTED]

18

A.

[REDACTED]

19

Q.

Okay. And who pays Ms. Joudeeta?

20

A.

The Mission.

21

Q.

The Observer Mission?

22

A.

Yes.

23

Q.

[REDACTED]

24

[REDACTED]

25

[REDACTED]

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A. [REDACTED]

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

[REDACTED]

Q. Understood. [REDACTED]

[REDACTED]

A. [REDACTED]

[REDACTED]

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

[REDACTED]

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

[REDACTED]

[REDACTED]

A. [REDACTED]

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The image consists of a single, uniform black rectangle that fills the entire frame. There are no discernible features, text, or patterns other than the solid black color.

1 [REDACTED]

2 A. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 Q. [REDACTED]

11 [REDACTED]

12 A. [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q. [REDACTED]

18 A. [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 Q. [REDACTED]

22 [REDACTED]

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24 [REDACTED]

25 A. [REDACTED]

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[REDACTED]

Q.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A.

[REDACTED]

[REDACTED]

Q.

[REDACTED]

[REDACTED]

[REDACTED]

A.

[REDACTED]

Q.

[REDACTED]

[REDACTED]

A.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q.

[REDACTED]

[REDACTED]

A.

[REDACTED]

Q.

Who owns the Observer Mission

building?

A.

The Mission.

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1 Q. And who pays the expenses for the
2 building?

3 A. The Mission.

4 Q. And where does the Mission obtain
5 the funding to pay for the building?

6 A. From the State of Palestine.

7 Q. And by the "State of Palestine," are
8 you referring to the PA?

9 A. The State of Palestine, I am
10 referring to the State of Palestine. This is
11 the Observer Mission of the State of Palestine
12 of the UN, and I am Ambassador Observer of --

13 THE COURT REPORTER: I'm
14 sorry, the witness is cutting out again.

15 THE WITNESS: I said I am the
16 Ambassador Observer of the State of Palestine
17 for the United Nations.

18 BY MR. WICK:

19 Q. What is your relationship between
20 the State of Palestine and the PA?

21 A. PA was formed by Palestine
22 Liberation Organization. Palestine Liberation
23 Organization is political party that is part of
24 the State of Palestine.

25 Q. I think that I and perhaps the

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1 reporter may have missed the first part of your
2 answer regarding the Palestinian Authority. So
3 I'm going to ask the question again because you
4 are cutting out in your response from time to
5 time.

6 What is the relationship between the
7 Palestinian Authority and the State of
8 Palestine?

9 A. Palestinian National Authority,
10 referred to it as the PA, was established by
11 the Palestine Liberation Organization as a
12 result of the Oslo agreement. Palestine
13 Liberation Organization is the umbrella from --
14 encompassing all political parties in
15 Palestine, those who are in the PLO, and the
16 State of Palestine is encompassing all these
17 things, including those who are not in the PLO.
18 It is like any other country.

19 Q. [REDACTED]

20 [REDACTED]

21 A. [REDACTED]

22 Q. [REDACTED]

23 A. [REDACTED]

24 Q. [REDACTED]

25 [REDACTED]

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[REDACTED]

A. [REDACTED]

[REDACTED]

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

[REDACTED]

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

Q. Do you have any other residences in the United States?

A. I have a personal house in Orlando, Florida.

Q. And does the Observer Mission pay any expenses for your house in Florida?

A. No.

Q. Does the PLO pay any expenses for your house in Florida?

A. No.

Q. Does the PA pay any expenses for your house in Florida?

A. No.

Q. Have you resided at any other properties in the United States since January

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1 4, 2020?

2 A. What do you mean by "resided"?

3 Q. Lived.

4 A. Visited, yes.

5 Q. But there are no other -- but there
6 are no other homes where you have lived during
7 that time period?

8 A. No other home that I lived.

9 Visited, yes.

10 Q. By "visited," you mean visiting as a
11 guest in somebody else's home?

12 A. Yes.

13 Q. I'm not asking about that. That's
14 fine.

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 A. [REDACTED]
20 [REDACTED]
21 Q. [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED], [REDACTED]
25 [REDACTED]

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1 A. [REDACTED]

2 [REDACTED]

3 THE COURT REPORTER: I'm

4 sorry, of your what?

5 THE WITNESS: [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 BY MR. WICK:

10 Q. [REDACTED]

11 [REDACTED]

12 A. [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 Q. Does the Observer Mission provide

20 you with a car?

21 A. [REDACTED]

22 Q. [REDACTED]

23 [REDACTED]

24 A. [REDACTED]

25 [REDACTED]

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Q.

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Q. Bear with me here just a moment,
please.

Let's go to Tab 3. I'm going to
show you a document, Dr. Mansour, that I would
like to have marked as Exhibit 3.

(Deposition Exhibit No. 3 was
marked for identification.)

BY MR. WICK:

Q. This document is numbered
Shatsky-JD00545, it's six pages, through
Shatsky-JD00550.

Dr. Mansour, is this the document
that you showed me earlier that you have with
you reflecting your calendar entries?

A. I believe so, yes.

Q. And to the best of your knowledge,

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1 MR. BERGER: Ron, I really
2 don't know what you mean by "the general
3 nature." You have asked a question about
4 whether something is a staff meeting. That is
5 perfectly acceptable to us. If you are asking
6 about what the topics were that were discussed
7 at the staff meeting, that is covered by
8 functional immunity.

9 BY MR. WICK:

10 Q. I'm going move down to the, about
11 two-thirds of the way down that first page,
12 there is an entry dated February 2, 2020 and
13 the subject line is interactions with civil
14 society organization Beit Hanina Cultural
15 Center Brooklyn on UN topics. Do you see that
16 entry?

17 A. Yes.

18 Q. Where did that event take place?

19 A. In Brooklyn.

20 Q. I apologize if I am mispronouncing
21 this. What is the Beit Hanina Cultural Center?

22 A. Civil society organization.

23 Q. What do you mean by a civil society
24 organization?

25 A. It is a civil society organization

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1 of the community, Palestinian-Americans, who
2 were originally from Beit Hanina, which is a
3 neighborhood in Jerusalem, who are residing in
4 Brooklyn.

5 Q. And what is the purpose of the
6 organization?

7 A. I don't really know. You have to
8 ask, you know, the organizers of this
9 organization. They are better qualified --

10 Q. To your knowledge, does the Beit
11 Hanina Cultural Center have any connection to
12 the United Nations?

13 A. So the work of the United Nations,
14 many people might not know that it is not only
15 diplomats, it is diplomats' involvement of
16 civil society organization, involvement of the
17 media, involvement of the missions, involvement
18 of parliamentarians, involvement of so many
19 sectors of different societies, because the way
20 the UN operates, it invites so many different
21 representations of different societies and
22 countries that participate in the decision
23 making process.

24 So, therefore, there are hundreds,
25 maybe more than hundreds, civil society

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1 organizations that are accredited to the United
2 Nations or --

3 THE COURT REPORTER: Excuse
4 me, please.

5 The videographer, is there some way
6 of correcting the audio between the witness and
7 Mr. Berger because I'm having trouble with the
8 witness cutting out and then Mr. Berger, when
9 he speaks, there is a lot of echoing on my end.

10 THE VIDEOGRAPHER: We are now
11 off the record. The time is 14:31 UTC time.

12 (Discussion held off the
13 record.)

14 THE VIDEOGRAPHER: We are
15 back on the record. The time is 14:36 UTC
16 time.

17 BY MR. WICK:

18 Q. Dr. Mansour, before we had to go off
19 the record, you were in the middle of an answer
20 to my question. I had asked you whether the
21 Beit Hanina Cultural Center had any connection
22 to the United Nations and you were explaining
23 that the United Nations involves multiple
24 organizations.

25 Is there anything more that you

1 wanted to say?

2 A. No. Just, basically, I was saying
3 the nature of work at the United Nations, it is
4 so encompassing and exclusive that it allows
5 for participation in the decisionmaking process
6 to so many different players; representatives
7 of countries, representatives of multicultural
8 organizations, civil society organizations,
9 media, parliamentarians, all components of
10 society because the agenda of the UN, it
11 involves humanity in so many different ways.

12 I will give an example. For
13 example, when we debate climate change, that is
14 not only the domain of diplomats, it is civil
15 society admissions, activists, private sectors,
16 all of them, they have a stake on this issue.

17 And the UN and the Secretary General
18 and the General Assembly invite all those to
19 contribute to that collective effort of all of
20 us of how we view these issues and what we
21 legislate.

22 So, therefore, everybody has
23 something to contribute. So in this example,
24 this civil society organization, the
25 Palestinian-Americans, they feel that they have

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1 a role to influence those who are dealing with
2 the question of Palestine at the UN with
3 whatever they have in their mind.

4 Q. Does the Beit Hanina Cultural Center
5 have any accreditation from the United Nations?

6 A. As far as I know, I don't really
7 know. They may, they may not. I will just
8 give an example. There are hundreds who are
9 accredited civil society organizations. Some
10 of them are Palestinian, some of them are
11 Palestinian-American. Many of them are
12 Jewish-American organization or Israeli
13 organization.

14 Some of them, they go through the
15 scrutiny of the Social and Economic Council to
16 approve them as accredited civil society
17 organization, who may be on the Exercise of the
18 Inalienable Rights has its own mechanism of
19 accrediting civil society organization, and
20 there are hundreds of them that are accredited
21 by that group. I am just giving you an example
22 how things are at the United Nations, not only
23 diplomats operating in a vacuum. We operate
24 within the dynamics of what is happening, all
25 of us.

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1 Q. I understand that. To be clear, you
2 don't know whether the Beit Hanina Cultural
3 Center is accredited by the United Nations;
4 correct?

5 A. I don't know.

6 Q. And what does it mean for a civil
7 society organization to be accredited by the
8 United Nations?

9 A. To be invited --

10 THE COURT REPORTER: I'm
11 sorry, I did not hear the ending.

12 THE WITNESS: To be
13 accredited, to be invited to events. For
14 example, if you are an accredited women
15 organization, there are so many conferences and
16 events related to the rights of women. So then
17 if you are accredited, you will be invited, you
18 will listen to debates, you can contribute to
19 debates, you can lobby for certain kind of
20 resolutions and you are allowed to vote on
21 these things, as an example.

22 MR. WICK: Let me put up Tab
23 16, please. I am going to ask that this
24 document be marked as next in order, I believe
25 Exhibit 5.

1 Nations, you will see big signs on the wall of
2 the United Nations for the public to see how
3 plastic is bad and eliminate plastic from use.

4 Q. So if you speak to an organization
5 at a non-public event about the use of
6 plastics, you would consider that part of your
7 organization's functional immunity?

8 A. If they invite me on my capacity as
9 Permanent Observer, Ambassador of the State of
10 Palestine, and in my capacity as a previous
11 chair of the Group of 77 and China, speak about
12 plastic and its negative effect on our
13 environment, that is within my exclusive domain
14 in exercising my authority as observership
15 activities as the Observer of the --

16 Q. Let's go to the next page, please.
17 On the next page, there is, about a third of
18 the way down, there's an entry dated March 26,
19 2021, interactions with civil society
20 organization [REDACTED] on UN topics.

21 Do you see that?

22 A. March 20 what?

23 Q. 6.

24 A. 26. Yes.

25 Q. And where did that event take place?

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1 A. It was virtual for [REDACTED]

2 [REDACTED]

3 Q. [REDACTED]

4 [REDACTED]

5 A. [REDACTED]

6 Q. What was the name of [REDACTED]

7 [REDACTED]

8 A. [REDACTED]

9 [REDACTED]

10 [REDACTED].

11 Q. What was the nature of the group?

12 A. [REDACTED]

13 [REDACTED]

14 Q. Okay. And does [REDACTED]

15 have any connection to the United Nations?

16 A. No, it doesn't. But I can, again,
17 tell you that faith-based organizations, almost
18 all churches in the United States and
19 worldwide, have Observers at the United
20 Nations. There is a building across the street
21 from the United Nations where there are so many
22 representatives from these different churches,
23 they represent them in the works of the General
24 Assembly, and they are a key player in so many
25 global issues in the agenda of the UN.

1 So, therefore, faith-based
2 organizations are mainly churches, are very
3 active and heavily involved in the affairs of
4 the United Nations.

5 And as you may know, the state of
6 the Vatican, as an Observer state seat in the
7 General Assembly, as us, Observer Mission of
8 the State of Palestine.

9 Q. A few lines down the page, there is
10 an entry on April 16, interaction with civil
11 society organization Boston College on UN
12 topics.

13 Do you see that?

14 A. Yes.

15 Q. And was that also a virtual event?

16 A. Actually, that did not take place.

17 Q. It did not take place?

18 A. No.

19 Q. It was canceled?

20 A. This is the wrong thing on my
21 agenda. I should have picked up that. But
22 there was another college, it should be on the
23 agenda, I think South -- South something --
24 Bridgewater. So that this is -- my secretary
25 made a mistake. It just said Boston College.

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1 that and I want to put that on the record,
2 which is the very cover page of the calendar
3 says that it is subject to claims of functional
4 immunity and jurisdictional immunity. We put
5 it in the public calendar because it's listed
6 as a public event in the UN's public calendar.

7 MR. WICK: Thank you,
8 Mr. Berger.

9 BY MR. WICK:

10 Q. Let's go to the next page. There is
11 an entry, not quite halfway down, October 22,
12 2020, titled Zoom meeting with ADC. Do you see
13 that?

14 A. Yes.

15 Q. And do you know what that entry is
16 for?

17 A. Yes.

18 Q. What was that event?

19 A. It was an event with ADC, which is
20 an accredited organization to the United
21 Nations, the Anti-Discrimination Committee,
22 about, you know, our work at the UN and
23 discussions with those who participated from
24 their side on this event. They invited me in
25 my official capacity as the Ambassador of the

1 State of Palestine, Permanent Observer to the
2 State of Palestine to the United Nations.

3 Q. We are going to show you a video
4 that we will have marked as Exhibit 7, please.

5 (Deposition Exhibit No. 7 was
6 marked for identification.)

7 (Video playing.)

8 BY MR. WICK:

9 Q. Dr. Mansour, do you recognize that
10 as a video of the ADC meeting described in your
11 October 22, 2020 calendar entry?

12 A. Yes.

13 Q. And where were you when you appeared
14 at --

15 A. [REDACTED]

16 Q. [REDACTED]
17 [REDACTED]

18 A. Yes.

19 Q. We can go back to the calendar.
20 What was the purpose of your appearance at the
21 ADC event, Dr. Mansour?

22 A. [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

July 08, 2021

1

[REDACTED]

2

[REDACTED]

3

Q.

[REDACTED]

4

[REDACTED]

5

A.

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

Q.

I'm going to ask the question again

14

because I don't think that I got a clear

15

answer.

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

A.

[REDACTED]

20

[REDACTED]

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

Q.

[REDACTED]

July 08, 2021

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

A.

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

Q. And that was members of the ADC;

9

correct?

10

A. I assume so. I don't know if they

11

are members or what.

12

Q. There is another entry on November

13

14, 2020, speak at the first convention of Beit

14

Sahour?

15

A. Sahour. Beit Sahour.

16

Q. Beit Sahour.

17

A. Yes.

18

Q. And what was that event?

19

A. This is another civil society

20

organization for Palestinian-Americans. I

21

believe it's in Michigan. And then they were

22

organizing themselves, building an

23

organization, and they invited me, in my

24

capacity as the Ambassador of the State of

25

Palestine to the United Nations, to say a few

July 08, 2021

1 words of congratulating them on the occasion of
2 their convention, and I shared with them what
3 we do at the United Nations.

4 Q. And we have another video to show
5 you, which we would like to mark as Exhibit 8.

6 (Deposition Exhibit No. 8 was
7 marked for identification.)

8 (Video playing.)

9 BY MR. WICK:

10 Q. Dr. Mansour, do you recognize that
11 as a video of the speech described on your
12 November 14, 2020 calendar entry?

13 A. Yes.

14 Q. And you gave that speech virtually;
15 correct?

16 A. That is correct.

17 Q. [REDACTED]
18 [REDACTED]

19 A. [REDACTED]

20 Q. [REDACTED]

21 A. That is correct.

22 MR. BERGER: May I please ask
23 for clarification of the record, which is,
24 you're showing very short clips of maybe eight
25 or ten seconds. When you're asking if he

July 08, 2021

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

Q.

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

A.

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

Q.

There is an entry on November 19,

12

2020 titled Seton Hall University virtual talk.

13

What does that entry signify?

14

A.

Yes. What date is that? November.

15

Again, I was invited and it was done virtually

16

through Speche, if I am not mistaken, it might

17

be the political science department or

18

something to do with international law, Seton

19

Hall University.

20

Again, academia and universities are

21

key components of the work of the United

22

Nations. I talk about Model UN on part of it

23

and the other part, what they teach, they

24

teach, you know, concrete issues.

25

I was a teacher and I used to teach

July 08, 2021

1 issues related to the agenda of the UN, and
2 they wanted to know what we do at the United
3 Nations in trying to find a peaceful solution
4 to this conflict.

5 I obliged them and I spoke on that
6 subject related to my work at the UN.

7 Q. All right. We would like to show
8 you another video which we will mark Exhibit 9,
9 an excerpt from a video.

10 (Deposition Exhibit No. 9 was
11 marked for identification.)

12 (Video playing.)

13 BY MR. WICK:

14 Q. Dr. Mansour, do you recognize that
15 excerpt as an excerpt from a video of the talk
16 described in your November 19, 2020 calendar
17 entry?

18 A. I do.

19 Q. Was that a talk given to university
20 students or college students in the United
21 States?

22 A. Yes.

23 Q. [REDACTED]

24 [REDACTED]
25 A. [REDACTED]

July 08, 2021

1

[REDACTED]

2

Q.

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

A.

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

Q. The next entry is November 23, 2020

12

-- not the next entry -- well, it is the next

13

entry. It states, bureau meeting. Do you see

14

that entry?

15

A. Yes.

16

Q. Do you know what that means?

17

A. Yes.

18

Q. What is the bureau being referred

19

to?

20

A. It is the Bureau of Committee on the

21

Exercise of the Inalienable Rights of the

22

Palestinian People, it is a General Assembly

23

committee.

24

Q. Last item on the page, December 10,

25

2020, titled, all I want for Christmas is a

July 08, 2021

1 Bridgewater State event?

2 A. I don't know if it was on that day.
3 I remember, for that university, dates changed
4 more than one time, and it could be that
5 function on April 6, not on that date
6 previously.

7 Q. Okay. I would like to show you a
8 video that we would like to have marked as
9 Exhibit 10.

10 (Deposition Exhibit No. 10 was
11 marked for identification.)

12 (Video playing.)

13 BY MR. WICK:

14 Q. Dr. Mansour, do you recognize that
15 as an excerpt from a video of, or a speech to
16 Bridgewater State University as reflected in
17 your calendar entry?

18 A. Yes.

19 Q. This is the April 6, 2021 entry that
20 we have been discussing, Palestinian affairs
21 and the Biden administration?

22 A. I believe so.

23 Q. And you were speaking to U.S.
24 college students in that speech; correct?

25 A. And professors.

July 08, 2021

1 Q. And professors. And where were you
2 when you gave the presentation?

3 A. [REDACTED]
4 [REDACTED]

5 Q. [REDACTED]
6 [REDACTED]

7 A. [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 Q. [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 A. [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

July 08, 2021

1




2

THE COURT REPORTER: I'm

3

sorry, Doctor, you cut out again at the end.

4

THE WITNESS: 

5



6



7

BY MR. WICK:

8

Q. On -- the next item I would like to

9

ask about is May, the very bottom, May 6, 2021,

10

informal active dialogues with the candidates.

11

And if we scroll to the next page, you will see

12

an identical entry for May 7, 2021.

13

Do you see those two entries?

14

A. Yes.

15

Q. What was that event?

16

A. You know, another aspect of the work

17

of the United Nations. Many countries run for

18

offices. For example, every year we have five

19

countries running for seats in the Security

20

Council. So the candidates, they lobby

21

countries or groups so that they can get their

22

votes and to win a seat in the Security

23

Council.

24

Also, we have elections for judges

25

of international corporate justice. Countries

July 08, 2021

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25

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. Did you ask any questions of the candidates?

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. There is an entry on May 19, 2021 titled, interview with Morning Joe on MSNBC. You were interviewed that day, you were interviewed live on the Morning Joe program;

July 08, 2021

1 correct?

2 A. That is correct.

3 Q. As you might guess, we are going to
4 show you an interview, or a video, excuse me,
5 that we would like to mark as Exhibit 11. We
6 will show you an excerpt from the interview.

7 (Deposition Exhibit No. 11 was
8 marked for identification.)

9 (Video playing.)

10 BY MR. WICK:

11 Q. Dr. Mansour, do you recognize that
12 as an excerpt of a -- of your interview with
13 the Morning Joe program notated on your
14 calendar for May 19, 2021?

15 A. I do.

16 Q. And where were you when you gave
17 that interview?

18 A. [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 Q. [REDACTED]
22 [REDACTED]

23 A. [REDACTED]

24 Q. And you were speaking in that
25 interview to the American public; correct?

July 08, 2021

1 A. I was speaking to Joe and the lady
2 who is the co-anchor woman and through them, I
3 guess, to their audience.

4 Q. [REDACTED]
5 [REDACTED]
6 [REDACTED]

7 A. [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

July 08, 2021

1 Q. Next, May 22, 2021, there is an
2 entry for Al Jazeera interview. Do you see
3 that?

4 A. May what, 20?

5 Q. May 22, 2021?

6 A. I see it.

7 Q. Does that entry reflect you were
8 interviewed by Al Jazeera on that date?

9 A. Yes.

10 Q. I want to show you a video marked as
11 Exhibit 12.

12 (Deposition Exhibit No. 12 was
13 marked for identification.)

14 BY MR. WICK:

15 Q. Do you recognize Exhibit 12 as an
16 excerpt from a video of your interview with Al
17 Jazeera that's reflected in your calendar on
18 May 22, 2021?

19 A. That is correct.

20 Q. [REDACTED]
21 [REDACTED]

22 A. [REDACTED]

23 Q. [REDACTED]

24 A. [REDACTED]
25 [REDACTED]

July 08, 2021

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Q. [REDACTED]

[REDACTED]

A. [REDACTED]

Q. [REDACTED]

[REDACTED]

[REDACTED]

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. Then on May 25, 2021, there is an entry, virtual farewell meeting with ICC prosecutor.

Do you see that?

A. Yes.

Q. What was that event?

A. We are -- it is an event to say goodbye to Madam Bensouda, who is the prosecutor of the ICC, she finished and, you know, members of the ICC and we are a state party member and, in fact, we sit on the Bureau

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1 1:40?

2 MR. BERGER: Very good.

3 Thanks.

4 THE VIDEOGRAPHER: We are now
5 off the record. The time is 1641 UTC time.

6 (At 12:41 p.m., a lunch recess
7 was taken.)

8 THE VIDEOGRAPHER: We are
9 back on the record. The time is 1743 UTC time.

10 BY MR. WICK:

11 Q. Good afternoon, Dr. Mansour. I want
12 to go back to the Observer Mission building.
13 You indicated the Observer Mission owns that
14 building. To be clear, the Observer Mission
15 has owned that building at all times since
16 January 4, 2020; is that correct?

17 A. I am sorry, can you repeat the
18 question, please?

19 Q. Yes. The question is, has the
20 Observer Mission owned the Observer Mission
21 building at all times since January 4th of
22 2020?

23 A. That is correct.

24 Q. I'm going to return to Exhibit 2
25 from very early in the deposition. As I

Dr. Riyadh Mansour

July 08, 2021

C E R T I F I C A T E

- - -

I, DR. RIYAD MANSOUR, do
hereby certify that I have read the foregoing
transcript and it is a true and correct copy of
my deposition, except for the changes, if any,
made by me on the attached Deposition
Correction Sheet.

Date

1	ERRATA SHEET	REASON FOR
2	PAGE LINE	CHANGE/CORRECTION
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July 08, 2021

1 COMMONWEALTH OF PENNSYLVANIA)
2) SS
3 COUNTY OF ALLEGHENY)

4 CERTIFICATE

5 I, Karen A. Nickel, a notary public in and
6 for the Commonwealth of Pennsylvania, do hereby
7 certify that the witness, DR. RIYAD MANSOUR,
8 was by me first duly sworn to testify the
9 truth, the whole truth, and nothing but the
10 truth; that the foregoing deposition was taken
11 at the time and place stated herein; and that
12 the said deposition was recorded
13 stenographically by me and then reduced to
14 typewriting under my direction, and constitutes
15 a true record of the testimony given by said
16 witness.

17 I further certify that I am not a
18 relative, employee or attorney of any of the
19 parties, or a relative or employee of either
20 counsel, and that I am in no way interested
21 directly or indirectly in this action.

22 IN WITNESS WHEREOF, I have hereunto set my
23 hand and affixed my seal of office this 12th
24 day of July 2021.

25 

Karen A. Nickel, Notary Public
Registered Professional Reporter
Certified Realtime Reporter